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Proposed Reorganization Counsel for
Debtor-In-Possession

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re

SKYLOCK INDUSTRIES, a California
corporation,

Chapter 11 Debtor and
Debtor-In-Possession.

Case Number: 2:24-bk-17820 BB

Chapter 11

**SUPPLEMENT TO DEBTOR'S CASH
COLLATERAL MOTION
[MODIFICATION OF PROPOSED
ADEQUATE PROTECTIONS
PAYMENT].**

Hearing Date/Time/Place

Date: October 1, 2024

Time: 10:00 a.m.

Place: 255 East Temple Street,
Courtroom 1539
Los Angeles, CA 90012

**TO THE HONORABLE SHERI BLUEBOND, UNITED STATES
BANKRUPTCY JUDGE AND TO ALL PARTIES ON THE ANNEXED SERVICE
LIST:** SKYLOCK INDUSTRIES, the debtor and debtor-in-possession in the above
entitled Chapter 11 proceeding (“Debtor”), hereby supplements its Motion for Use of
Cash Collateral filed at ECF Dkt. No. 3 as follows:

1 The Debtor modifies its request to pay \$1,000 to U.S. Small Business
2 Administration as an adequate protection payment and to deposit and reserve \$4,000 in its
3 cash collateral account for Pasadena Private Finance ("PPF") pending resolution of PPF's
4 claim as follows:

5 After discussions with the SBA, the Debtor now proposes to pay \$2511 per month
6 to the SBA as adequate protection payments, commencing November 1, 2024 and
7 proposes to reserve \$2,489 per month on account of PPF's disputed claim.

8 **WHEREFORE**, the Debtor prays that the Court enter an order granting the relief
9 requested above, and such additional relief as the Court deems just and proper.

10 Respectfully submitted,

11 Dated: September 30, 2024

JEFFREY S. SHINBROT, APLC

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13 By: /s/Jeffrey S. Shinbrot
14 Jeffrey S. Shinbrot, Proposed General
15 Insolvency Counsel to Skylock
16 Industries
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

15260 Ventura Blvd., Suite 1200
Sherman Oaks, CA 91403

A true and correct copy of the foregoing document entitled (*specify*): **SUPPLEMENT TO DEBTOR'S CASH COLLATERAL MOTION [MODIFICATION OF PROPOSED ADEQUATE PROTECTIONS PAYMENT]**; will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below.

X 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 9/30/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Misty A Perry Isaacson** misty@ppilawyers.com, ecf@ppilawyers.com;pagterandperryisaacson@jubileebk.net
- **David Samuel Shevitz** David.S.Shevitz@usdoj.gov
- **Jeffrey S Shinbrot** jeffrey@shinbrotfirm.com, sandra@shinbrotfirm.com;tanya@shinbrotfirm.com
- **Rachel P Stoian** stoian.rachel@dorsey.com, stell.laura@dorsey.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
-

X SERVED BY UNITED STATES MAIL: On (*date*) 9/30/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

X additional service list attached

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*), I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

9/30/2024

Date

Sandra Rodriguez

Printed Name

/s/Sandra Rodriguez

Signature

Top 20 Unsecured Creditors

Abrasive Finishing Company
14920 South Main Street
Gardena, CA 9024
Email: quotes@afco.la

Accurate Bushing Co., Inc.,
443 North Avenue
Garwood, NJ 07277

Aircraft X-Ray Laboratorie Inc.
5216 PACIFIC BLVD,
Huntington Park, CA 90255

Blue Sky Industries
FDH AERO LLC,
5200 SHEILA,
Los Angeles, CA 90040

Consolidated Industries Inc.,
677 Mixville Road
Cheshire, CT 06410

Don Redmon
13246 W. Cameridge Ave
Goodyear, AZ 85395-2118

Federal Express
PO Box 7221
Pasadena, CA 91109-8321
310-563-4042

General Aircraf Company
321 Kinetic Drive
Oxnard, CA 93030
accounting@gen
eralaircraft.com

Health Net Insurance
File # 52617
Los Angeles, CA 90074-2617

Los Angeles County
Tax Collector
PO Box 54018
Los Angeles, CA 90054-0018

Multitect CNC
38588 Lion Way
Palmdale, CA 93551
multitechcnbservice@yahoo.com

ND Testing, Inc.,
11473 Pacific Avenue
Fontana, CA 92337

Plymouth Tube Company-
Corporate Headquarters
29W150 Warrenville Rd.
Warrenville, IL 6055
sales@plymouth.com

Pro Centur Insurance
PO Box 30002
Tampa, FL 33630-3002

Service Steel Aerospace
7925 Crossway Drive
Pico Rivera, CA 90660

Corporate office
4609 70th Avenue E
Fife, WA 98424

Sierra Alloys Co.
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Irwindale, CA 91706
info@sierraalloys.com

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Carson City, NV 89706

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Camarillo, CA 93012

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Email MRO@spiritaero.com

Secured Creditors

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Pasadena Private Finance LLC
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